

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

REIN TECH, INC.,

Plaintiff,

v.

MUELLER SYSTEMS, LLC

Defendant.

C.A. No. 1:18-cv-01683-MN

**DECLARATION OF COBY S. NIXON IN SUPPORT OF DEFENDANT MUELLER
SYSTEMS, LLC'S APPLICATION FOR ATTORNEYS' FEES AND COSTS
INCURRED IN CONNECTION WITH ITS MOTION FOR SANCTIONS**

I, Coby S. Nixon, declare as follows:

1. I am a Shareholder and attorney at the law firm of Buchalter APC and am counsel to Defendant Mueller Systems, LLC (“Mueller”) in the above-captioned matter.
2. I respectfully submit this declaration in support of Mueller’s Application for Fees and Costs Incurred in Connection with its Motion for Sanctions (the “Fee Application”).
3. I am over the age of 18 and have personal knowledge of the facts set forth herein.
4. Attached as Exhibit A hereto is a true and correct copy of a chart summarizing the fees and costs that Buchalter APC incurred in connection with Mueller’s letter motion for sanctions (D.I. 166) (the “Sanctions Motion”) against Plaintiff Rein Tech, Inc. (“Rein Tech”). The total amount of fees and costs sought by Buchalter APC is \$38,614.87.
5. Exhibit A is derived from time records maintained by Buchalter APC in the ordinary course and details the work date, the timekeeper, a description of the work performed, the hours billed, the hourly rate of the timekeeper, and the fees billed for those hours.

6. This work included time that I and/or Cory Mull, an associate attorney with Buchalter APC, spent in investigating the legal and factual bases for the Sanctions Motion, meeting and conferring with Rein Tech’s counsel, drafting the letter brief in support of the Sanctions Motion, preparing for and attending in-person the July 10, 2025, hearing solely as it relates to the Sanctions Motion (i.e., excluding work performed in connection with the dispute concerning Rein Tech’s supplemental infringement contentions, which was argued by Seth K. Trimble of our office), and preparing for and attending via telephone the August 1, 2025 hearing on the Sanctions Motion.

7. In an attempt to reach agreement on the amount to be paid to Mueller, I sent a copy of Exhibit A to Rein Tech’s counsel on August 19, 2025. *See Exhibit B*, a true and correct copy of an email chain between counsel for the parties, at 8.

8. On September 5, 2025, counsel for the parties met and conferred by videoconference and discussed the time entries in Exhibit A. On the conference, I explained that Exhibit A does not include time spent by Mr. Trimble or by Mueller’s Delaware counsel in connection with the Sanctions Motion.

9. On September 11, 2025, Rein Tech stated that it “will not object to the fee amount but we will not consent to it either.” *Id.* at 4.

10. On September 19, 2025, I provided Rein Tech’s counsel with a draft of Mueller’s Fee Application, including Exhibit A (with no revisions) and the Proposed Order. *Id.* at 3.

11. On September 29, 2025, Rein Tech provided its position on the Fee Application, stating that it “may have agreed to the amount on the condition that it would be a set off or payment at the end of trial but not an immediate payment.” *Id.* at 1.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 1st day of October, 2025, in Atlanta, Georgia.

/s/ Coby S. Nixon

Coby S. Nixon
Attorney for Defendant
Mueller Systems, LLC
(Admitted *pro hac vice*)

EXHIBIT A

EXHIBIT A

Date	Timekeeper	Description of Services Rendered	Hours	Rate	Amount
4/3/2025	Cory Mull	SEARCH METADATA FROM PREVIOUS REIN TECH FILINGS, CONTENTIONS, AND OTHER DOCUMENTS FOR EARLIEST EVIDENCE THAT KLICPERA VIEWED MUELLER AEO-MARKED DOCUMENTS	1.5	\$ 330	\$ 495.00
4/6/2025	Coby Nixon	REVIEW EMAIL MEMORANDUM AND ATTORNEY NOTES FROM C. MULL REGARDING EVIDENCE THAT KLICPERA VIOLATED PROTECTIVE ORDER, INCLUDING PATENT PROSECUTION BAR	0.5	\$ 460	\$ 230.00
4/9/2025	Coby Nixon	DRAFT DETAILED EMAIL TO OPPOSING COUNSEL SETTING FORTH GROUNDS FOR SANCTIONS DUE TO KLICPERA'S VIOLATIONS OF PROTECTIVE ORDER; CONDUCT LEGAL RESEARCH IN SUPPORT OF SAME; EMAILS WITH LOCAL COUSNEL REGARDING PROPER PROCEDURES FOR RAISING THESE DISPUTES	1.9	\$ 460	\$ 874.00
4/21/2025	Coby Nixon	EMAILS WITH OPPOSING COUNSEL REGARDING PROPOSED MOTIONS AND NEED FOR MEET AND CONFER CALL	0.2	\$ 460	\$ 92.00
4/28/2025	Coby Nixon	PREPARE FOR MEET AND CONFER CALL WITH OPPOSING COUNSEL REGARDING MOTION FOR VIOLATION OF PROTECTIVE ORDER BY REVIEWING PRIOR PLEADINGS AND CORRESPONDENCE; ATTEND MEET AND CONFER CALL; FOLLOW UP CONFERENCE WITH LOCAL COUNSEL	2.2	\$ 460	\$ 1,012.00

4/28/2025	Cory Mull	MEET AND CONFER WITH REIN TECH'S ATTORNEY, JACK SHRUM, RELATED TO MUELLER'S MOTIONS TO STRIKE REIN TECH'S UNTIMELY SUPPLEMENTAL INFRINGEMENT CONTENTIONS AND SEEK SANCTIONS FOR VIOLATION OF THE PROTECTIVE ORDER. INVESTIGATE KLICPERA'S EARLIEST LIKELY AEO EXPOSURE FURTHER BASED ON INFORMATION CONVEYED BY SHRUM	3.2	\$ 330	\$ 1,056.00
4/29/2025	Coby Nixon	CONTINUE LEGAL RESEARCH REGARDING MOTIONS FOR VIOLATIONS OF PROTECTIVE ORDERS AND POTENTIAL REMEDIES FOR SAME; BEGIN DRAFTING LETTER TO THE COURT IN SUPPORT OF MOTION FOR SANCTIONS DUE TO REIN TECH'S VIOLATIONS OF PROTECTIVE ORDER	4.2	\$ 460	\$ 1,932.00
5/6/2025	Coby Nixon	FOLLOW UP EMAIL TO OPPOSING COUNSEL REGARDING NOTIFYING THE COURT OF MUELLER'S PROPOSED MOTION FOR SANCTIONS	0.2	\$ 460	\$ 92.00
5/7/2025	Coby Nixon	DRAFT STIPULATION WITH BRIEFING SCHEDULE FOR DISCOVERY DISPUTES; EMAILS WITH LOCAL COUNSEL REGARDING SAME	0.7	\$ 460	\$ 322.00
5/8/2025	Coby Nixon	EMAILS WITH OPPOSING COUNSEL REGARDING STIPULATION FOR DISCOVERY AND PROTECTIVE ORDER DISPUTES	0.3	\$ 460	\$ 138.00
5/9/2025	Coby Nixon	BEGIN DRAFTING BRIEF IN SUPPORT OF MOTION FOR SANCTIONS; CONDUCT LEGAL RESEARCH IN SUPPORT OF SAME	2.6	\$ 460	\$ 1,196.00
5/12/2025	Coby Nixon	CONTINUE TO DRAFT AND REVISE LETTER BRIEF IN SUPPORT OF MOTION FOR SANCTIONS; EMAILS WITH LOCAL COUNSEL REGARDING SAME	4.2	\$ 460	\$ 1,932.00
5/15/2025	Coby Nixon	PREPARE REDACTED VERSION OF BRIEF ON MOTION FOR SANCTIONS FOR PUBLIC FILING; REVIEW REIN TECH'S RESPONSE TO MOTION FOR SANCTIONS	1.6	\$ 460	\$ 736.00

5/15/2025	Cory Mull	REVIEW REIN TECH'S LETTER OPPOSING MUELLER'S MOTION FOR SANCTIONS FOR VIOLATION OF THE PROTECTIVE ORDER	0.4	\$ 330	\$ 132.00	
7/7/2025	Cory Mull	BEGIN PREPARATION FOR REIN TECH HEARING ON VIOLATION OF PROTECTIVE ORDER	3.6	\$ 330	\$ 1,188.00	
7/8/2025	Cory Mull	PREPARATION FOR REIN TECH HEARING ON VIOLATION OF PROTECTIVE ORDER	8.2	\$ 330	\$ 2,706.00	
7/9/2025	Cory Mull	TRAVEL TO DELAWARE FOR HEARING AND FINAL PREPARATION	10.3	\$ 330	\$ 3,399.00	
7/10/2025	Cory Mull	ATTEND HEARING RELATED TO VIOLATIONS OF PROTECTIVE ORDER AND RETURN TRAVEL FROM DELAWARE	9.3	\$ 330	\$ 3,069.00	
7/11/2025	Cory Mull	IN LIGHT OF COURT'S COMMENTS IN HEARING AND SCHEDULING OF FOLLOW-UP HEARING, SEARCH META DATA FOR REIN TECH CONTENTIONS FOR EVIDENCE MORE DIRECTLY DEMONSTRATING MICHAEL KLICPERA 'S ACCESS AND RELIANCE ON MUELLER'S AEO DESIGNATED DOCUMENTS	4.3	\$ 330	\$ 1,419.00	
7/18/2025	Coby Nixon	ORDER FROM THE COURT SETTING FOLLOW UP HEARING ON MOTION FOR SANCTIONS DUE TO REIN TECH'S BREACH OF THE PROTECTIVE ORDER	0.2	\$ 460	\$ 92.00	
7/21/2025	Coby Nixon	EMAILS WITH LOCAL COUNSEL REGARDING LOGISTICS FOR FOLLOW UP HEARING ON MOTION FOR SANCTIONS AGAINST REIN TECH	0.4	\$ 460	\$ 184.00	
7/23/2025	Coby Nixon	EMAIL TO THE CLIENT WITH UPDATE REGARDING RECENT HEARING ON MOTIONS; CONDUCT SUPPLEMENTAL LEGAL RESEARCH IN PREPARATION FOR FOLLOW-UP HEARING ON MOTION FOR SANCTIONS AGAINST REIN TECH FOR VIOLATIONS OF THE PROTECTIVE ORDER	2.0	\$ 460	\$ 920.00	

7/24/2025	Coby Nixon	CONTINUE LEGAL RESEARCH IN PREPARATION FOR FOLLOW UP HEARING	2.5	\$ 460	\$ 1,150.00
7/29/2025	Coby Nixon	REVIEW LETTER FROM REIN TECH TO THE COURT IN ADVANCE OF HEARING ON MOTION FOR SANCTIONS; MESSAGES WITH C. MULL AND S. TRIMBLE REGARDING SAME; PREPARE NOTES ON RESPONSIVE ARGUMENTS IN PREPARATION FOR HEARING	2.4	\$ 460	\$ 1,104.00
7/29/2025	Cory Mull	PREPARATION FOR AUGUST 1 HEARING ON VIOLATION OF PROTECTIVE ORDER	3.8	\$ 330	\$ 1,254.00
7/30/2025	Coby Nixon	CREATE NOTES IN RESPONSE TO REIN TECH FILING FOR USE IN CONNECTION WITH HEARING; CONFERENCES WITH C.MULL AND S. TRIMBLE REGARDING STRATEGIES FOR HEARING; REVIEW AND REVISE DRAFT HEARING PRESENTATION	4.4	\$ 460	\$ 2,024.00
7/30/2025	Cory Mull	REVIEW OF REIN TECH'S JULY 29, 2025, LETTER TO THE COURT AND INCLUDED EXHIBITS RELATED TO UPCOMING. PREPARE RESPONSIVE ARGUMENTS AND PRESENTATION FOR UPCOMING HEARING	8.7	\$ 330	\$ 2,871.00
7/31/2025	Coby Nixon	CONTINUE PREPARATION FOR SANCTIONS HEARING; CONFERENCES WITH C. MULL REGARDING SAME	2.0	\$ 460	\$ 920.00
7/31/2025	Cory Mull	PREPARATIONS FOR AUGUST 1 HEARING; COMMUNICATIONS AND PREPARATION WITH LOCAL COUNSEL TO ARRANGE FOR COVERAGE OF AUGUST 1 HEARING	2.5	\$ 330	\$ 825.00
8/1/2025	Coby Nixon	CALL WITH LOCAL COUNSEL TO PREPARE HIM TO ARGUE AT SANCTIONS HEARING; FOLLOW UP EMAILS REGARDING SAME; ATTEND SANCTIONS HEARING VIA TELECONFERENCE; FOLLOW UP CONFERENCES REGARDING SANCTIONS AWARD	4.3	\$ 460	\$ 1,978.00

8/1/2025	Cory Mull	ORGANIZATION OF MATERIALS AND REVIEW SESSION WITH LOCAL COUNSEL TO PREPARE LOCAL COUNSEL TO DELIVER PRESENTATION TO THE COURT; REMOTELY ATTEND AND PARTICIPATE IN HEARING ON VIOLATION OF THE PROTECTIVE ORDER	5.2	\$ 330	\$ 1,716.00
				Fees:	\$ 37,058.00
Date	Timekeeper	Description of Expense			Amount
7/8/2025	Cory Mull	AIRFARE FOR TRIP TO DELAWARE TO ATTEND JULY 10, 2025 HEARING ON SANCTIONS FOR VIOLATION OF THE PROTECTIVE ORDER			\$ 985.97
7/9/2025	Cory Mull	HOTEL EXPENSE FOR TRIP TO DELAWARE TO ATTEND JULY 10, 2025 HEARING ON SANCTIONS FOR VIOLATION OF THE PROTECTIVE ORDER			\$ 570.90
				Costs:	\$ 1,556.87
				TOTAL:	\$ 38,614.87

EXHIBIT B

Nixon, Coby S.

From: Jack Shrum <jshrum@jshrumlaw.com>
Sent: Monday, September 29, 2025 5:19 PM
To: Kenneth L. Dorsney; Nixon, Coby S.
Cc: Trimble, Seth K.; Mull, Cory; Cortlan S. Hitch; Legal Assistant; @IP Para
Subject: RE: Rein Tech v. Mueller -- Redactions Request

This message has originated from an External Email. jshrum@jshrumlaw.com <jshrum@jshrumlaw.com>.

Ken,

My client is not going to consent to the timing of payment as set forth in your proposal. He may have agreed to the amount on the condition that it would be a set off or payment at the end of trial but not an immediate payment.

Please feel free to contact me to discuss.

Thank you.

Jack

JACK SHRUM, PA
CITIZENS BANK CENTER
919 N. Market Street, Suite 1410
Wilmington, DE 19801
Ph: 302-543-7551
Fax: 302-543-6386
Direct: 609-367-2430
E-mail: Jshrum@jshrumlaw.com

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From: Kenneth L. Dorsney <KDorsney@morrisjames.com>
Sent: Monday, September 29, 2025 9:32 AM
To: Nixon, Coby S. <cnixon@buchalter.com>; Jack Shrum <jshrum@jshrumlaw.com>
Cc: Trimble, Seth K. <strimble@buchalter.com>; Mull, Cory <cmull@buchalter.com>; Cortlan S. Hitch <CHitch@morrisjames.com>; Legal Assistant <legalassistant@jshrumlaw.com>; @IP Para <MJIPPara@morrisjames.com>
Subject: RE: Rein Tech v. Mueller -- Redactions Request

Jack,

Following up on Coby's email below. If we don't get the unopposed motion filed this week, we will move the Court early next week. Thank you.

Best,

Ken

Morris James

Kenneth L. Dorsney | Partner

3205 Avenue North Boulevard, Suite 100
Wilmington, DE 19803

Phone: 302.888.6855 | **Fax:** 302.571.1750

morrisjames.com | kdorsney@morrisjames.com

[Facebook](#) | [LinkedIn](#)

HEADQUARTERS ADDRESS CHANGE: Please take note that effective September 8, 2025, the Wilmington Headquarters office address has changed to Avenue North, 3205 Avenue North Blvd., Suite 100, Wilmington, DE 19803. We still maintain PO Box 2306, Wilmington, DE 19899.

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From: Nixon, Coby S. <cnixon@buchalter.com>

Sent: Monday, September 29, 2025 9:02 AM

To: Jack Shrum <jshrum@jshrumlaw.com>

Cc: Trimble, Seth K. <strimble@buchalter.com>; Mull, Cory <cmull@buchalter.com>; Cortlan S. Hitch <CHitch@morrisjames.com>; Kenneth L. Dorsney <KDorsney@morrisjames.com>; Legal Assistant <legalassistant@jshrumlaw.com>; @IP Para <MJIPPara@morrisjames.com>

Subject: RE: Rein Tech v. Mueller -- Redactions Request

Jack,

Can you get back to us today to confirm that we may file the application unopposed?

Thanks,

Coby

Buchalter

Coby S. Nixon

Shareholder

T (404) 832-7533

C (678) 910-9466

cnixon@buchalter.com

3475 Piedmont Rd. NE Suite 1100

Atlanta, GA 30305

www.buchalter.com

From: Nixon, Coby S.

Sent: Wednesday, September 24, 2025 9:47 AM

To: Jack Shrum <jshrum@jshrumlaw.com>

Cc: Trimble, Seth K. <strimble@buchalter.com>; Mull, Cory <cmull@buchalter.com>; Cortlan S. Hitch <CHitch@morrisjames.com>; Kenneth L. Dorsney <KDorsney@morrisjames.com>; Legal Assistant <legalassistant@jshrumlaw.com>; @IP Para <MJIPPara@morrisjames.com>

Subject: RE: Rein Tech v. Mueller -- Redactions Request

Jack,

I wanted to follow up on our draft application. We look forward to hearing from you.

Regards,

Coby

From: Nixon, Coby S. <cnixon@buchalter.com>

Sent: Friday, September 19, 2025 5:19 PM

To: Jack Shrum <jshrum@jshrumlaw.com>

Cc: Trimble, Seth K. <strimble@buchalter.com>; Mull, Cory <cmull@buchalter.com>; Cortlan S. Hitch <CHitch@morrisjames.com>; Kenneth L. Dorsney <KDorsney@morrisjames.com>; Legal Assistant <legalassistant@jshrumlaw.com>; @IP Para <MJIPPara@morrisjames.com>

Subject: RE: Rein Tech v. Mueller -- Redactions Request

Jack,

Attached for review is draft unopposed application, declaration in support, and proposed order for the fee amount we discussed. Please confirm that we may file.

Thanks,

Coby

Buchalter

Coby S. Nixon

Shareholder

T (404) 832-7533

C (678) 910-9466

cnixon@buchalter.com

3475 Piedmont Rd. NE Suite 1100
Atlanta, GA 30305
www.buchalter.com

From: Jack Shrum <jshrum@jshrumlaw.com>
Sent: Thursday, September 11, 2025 4:45 PM
To: Nixon, Coby S. <cnixon@buchalter.com>
Cc: Trimble, Seth K. <strimble@buchalter.com>; Mull, Cory <cmull@buchalter.com>; Cortlan S. Hitch <CHitch@morrisjames.com>; Kenneth L. Dorsney <KDorsney@morrisjames.com>; Legal Assistant <legalassistant@jshrumlaw.com>
Subject: RE: Rein Tech v. Mueller -- Redactions Request

This message has originated from an **External Email**. jshrum@jshrumlaw.com <jshrum@jshrumlaw.com>:

Coby,

Rein Tech will not object to the fee amount but we will not consent to it either. Please send along a draft Stipulation for my review.

Thank you.

Jack

JACK SHRUM, PA
CITIZENS BANK CENTER
919 N. Market Street, Suite 1410
Wilmington, DE 19801
Ph: 302-543-7551
Fax: 302-543-6386
Direct: 609-367-2430
E-mail: Jshrum@jshrumlaw.com

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From: Nixon, Coby S. <cnixon@buchalter.com>
Sent: Thursday, September 11, 2025 1:13 PM
To: Jack Shrum <jshrum@jshrumlaw.com>
Cc: Trimble, Seth K. <strimble@buchalter.com>; Mull, Cory <cmull@buchalter.com>; Cortlan S. Hitch <CHitch@morrisjames.com>; Kenneth L. Dorsney <KDorsney@morrisjames.com>
Subject: RE: Rein Tech v. Mueller -- Redactions Request

Jack,

Following up on our call last week, please let us know if Rein Tech will agree on the amount to be paid to Mueller.

Regards,

Coby

Buchalter

Coby S. Nixon

Shareholder

T (404) 832-7533

C (678) 910-9466

c Nixon@buchalter.com

3475 Piedmont Rd. NE Suite 1100

Atlanta, GA 30305

www.buchalter.com

From: Jack Shrum <jshrum@jshrumlaw.com>
Sent: Thursday, September 4, 2025 11:39 AM
To: Nixon, Coby S. <cnixon@buchalter.com>
Cc: Trimble, Seth K. <strimble@buchalter.com>; Mull, Cory <cmull@buchalter.com>; Cortlan S. Hitch <CHitch@morrisjames.com>; Kenneth L. Dorsney <KDorsney@morrisjames.com>
Subject: RE: Rein Tech v. Mueller -- Redactions Request

This message has originated from an **External Email**. jshrum@jshrumlaw.com <jshrum@jshrumlaw.com>:

Coby,

I am available at 2 PM tomorrow.

Jack

JACK SHRUM, PA
CITIZENS BANK CENTER
919 N. Market Street, Suite 1410
Wilmington, DE 19801
Ph: 302-543-7551
Fax: 302-543-6386
Direct: 609-367-2430
E-mail: Jshrum@jshrumlaw.com

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From: Nixon, Coby S. <cnixon@buchalter.com>
Sent: Thursday, September 4, 2025 9:59 AM
To: Jack Shrum <jshrum@jshrumlaw.com>
Cc: Trimble, Seth K. <strimble@buchalter.com>; Mull, Cory <cmull@buchalter.com>; Cortlan S. Hitch <CHitch@morrisjames.com>; Kenneth L. Dorsney <KDorsney@morrisjames.com>
Subject: Re: Rein Tech v. Mueller -- Redactions Request

Jack,

I wanted to follow up. What is your availability for a call tomorrow?

Thanks,

Coby

Buchalter

Coby S. Nixon
Shareholder
T (404) 832-7533
C (678) 910-9466
cnixon@buchalter.com

3475 Piedmont Rd. NE Suite 1100
Atlanta, GA 30305
www.buchalter.com

On Aug 29, 2025, at 5:48 PM, Nixon, Coby S. <cnixon@buchalter.com> wrote:

Jack,

I'm available next Wednesday afternoon (9/3) for a meet and confer call.

Thanks,

Coby

Buchalter

Coby S. Nixon
Shareholder

T (404) 832-7533
C (678) 910-9466
cnixon@buchalter.com

3475 Piedmont Rd. NE Suite 1100
Atlanta, GA 30305
www.buchalter.com

From: Jack Shrum <jshrum@jshrumlaw.com>
Sent: Friday, August 29, 2025 3:02 PM
To: Nixon, Coby S. <cnixon@buchalter.com>
Cc: Trimble, Seth K. <strimble@buchalter.com>; Mull, Cory <cmull@buchalter.com>; Cortlan S. Hitch <CHitch@morrisjames.com>; Kenneth L. Dorsney <KDorsney@morrisjames.com>
Subject: RE: Rein Tech v. Mueller -- Redactions Request

This message has originated from an External Email. jshrum@jshrumlaw.com <jshrum@jshrumlaw.com>:

Coby,

We have some questions about some of the time entries on your proposed draft for fees to the Court. We should discuss before you file this.

Also, attached are Rein Tech, Inc.'s Proposed Redactions to the Official Transcript from the hearing on August 1, 2025. Do you have any issues with these redactions? I will file it today.

Thank you.

Jack

JACK SHRUM, PA
CITIZENS BANK CENTER
919 N. Market Street, Suite 1410
Wilmington, DE 19801
Ph: 302-543-7551
Fax: 302-543-6386
Direct: 609-367-2430
E-mail: Jshrum@jshrumlaw.com

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From: Nixon, Coby S. <cnixon@buchalter.com>
Sent: Tuesday, August 19, 2025 4:57 PM
To: Jack Shrum <jshrum@jshrumlaw.com>
Cc: Trimble, Seth K. <strimble@buchalter.com>; Mull, Cory <cmull@buchalter.com>; Cortlan S. Hitch <CHitch@morrisjames.com>; Kenneth L. Dorsney <KDorsney@morrisjames.com>
Subject: Rein Tech v. Mueller - Mueller's Application for Attorneys' Fees

Jack,

Pursuant to the Court's August 1 Order, Mueller is preparing an application for its fees and costs associated with its motion for sanctions. In an effort to avoid unnecessary briefing and burdens on the parties and the Court, we write to see if the parties can reach agreement on the amount to be paid to Mueller.

Attached please find a chart we have prepared as a draft exhibit to a declaration in support of Mueller's application. The chart sets forth the fees and expenses incurred in connection with Mueller's motion, including the hearings held on July 10 and August 1. As you will see, the total amount of fees and expenses sought by Mueller is \$38,614.87.

Please let us know if Rein Tech will agree on this amount. If so, we will draft a joint letter and proposed order for your review. If you have any questions or wish to discuss, we are happy to hop on a call.

Regards,

Coby

Buchalter

Coby S. Nixon
Shareholder
T (404) 832-7533
C (678) 910-9466
cnixon@buchalter.com

3475 Piedmont Rd. NE Suite 1100
Atlanta, GA 30305
www.buchalter.com

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